

U.S. House of Representatives  
Committee on Natural Resources  
Washington, DC 20515

July 1, 2019

Mr. Carter Roberts  
President and CEO  
World Wildlife Fund  
1250 24th Street, N.W.  
Washington, DC 20037-1193

Dear Mr. Roberts:

On April 9, 2019, representatives of World Wildlife Fund United States (WWF-US) met with Committee staff regarding reports of human rights violations, including torture, sexual assault, and extrajudicial killings, by ranger and paramilitary forces supported by WWF<sup>1</sup> and tasked with preventing wildlife poaching.<sup>2</sup> Among the victims of these alleged abuses are vulnerable indigenous people living near protected areas. Despite the importance of protecting wildlife and preventing species extinction, the United States cannot be party to violations of basic human rights. Moreover, such abuses undermine local support for wildlife conservation efforts and may jeopardize long-term species recovery.

While we appreciate the information provided by WWF-US during this preliminary meeting, questions remain regarding the extent to which WWF was aware that entities it funded and equipped may have committed a wide range of human rights abuses, actions that were taken to prevent them, and what must be done to prevent them in the future. The Committee is encouraged by WWF-US's stated commitment to cooperate with this inquiry. To assist the Committee with its oversight activities, please produce the following documents and information as soon as possible, but no later than July 19, 2019:

1. The 2015 report prepared by Diel Mochire Mwenge and commissioned by WWF to examine WWF Cameroon operations;
2. The 2017 report prepared by Sam Nziengui-Kassa and commissioned by WWF on the Messok Dja National Park, Republic of the Congo;

<sup>1</sup> Unless otherwise described, WWF references WWF International, WWF National Organizations, WWF Associate Organizations, and WWF Program Offices. *See How is WWF Run?*, WORLD WILDLIFE FUND FOR NATURE, <https://wwf.panda.org/organization/> (last visited May 24, 2019).

<sup>2</sup> Warren, Tom and Baker, Katie J.M., *WWF Funds Guards Who Have Tortured And Killed People*, BUZZFEED NEWS (Mar. 4, 2019), <https://www.buzzfeednews.com/article/tomwarren/wwf-world-wide-fund-nature-parks-torture-death>; *see also* Baker, Katie J.M. and Warren, Tom, *A Leaked Report Shows WWF Was Warned Years Ago Of “Frightening” Abuses*, BUZZFEED NEWS (Mar. 5, 2019), <https://www.buzzfeednews.com/article/katiejmbaker/wwf-report-human-rights-abuses-rangers>; Warren, Tom and Baker, Katie J.M., *WWF Funds Guards Who Have Tortured And Killed People*, BuzzFeed News (Mar. 8, 2019), <https://www.buzzfeednews.com/article/katiejmbaker/wwf-eu-messok-dja-fears-repression-ecoguards>.

3. Documents sufficient to describe any and all grants, contracts, loans, and program-related investments to WWF from the U.S. Government for anti-poaching efforts or law enforcement activities that wholly or partially support armed rangers or paramilitary forces from January 1, 1998 to the present. The description should include the corresponding program locations, the WWF organizational unit receiving the grant, how the funds were to be used under the terms of the grant, the total amount of the grant, whether and how much of these funds were provided to another organizational unit of WWF, the duration of the grant, and any reports or other documents provided to the U.S. granting agency describing the outcomes of the grant, including but not limited to a final report.
4. WWF's current policies, procedures, and training materials for implementing WWF's Statement of Principles on Indigenous Peoples and Conservation in relation to, including but not limited to, managing informants, training eco-guards, and the provisioning of equipment to partner organizations or governments;
5. All documents, including but not limited to internal memoranda, contracts, memoranda of understanding, and cooperative agreements governing the relationship between WWF-US and program offices involved with anti-poaching overseen or supported by WWF-US; and
6. All documents, including but not limited to internal memoranda, contracts, memoranda of understanding, and cooperative agreements, governing the relationship between WWF-US and WWF International.

Please refer to the attached instructions on how to respond to this document request. As specified therein, upon completion of the document production, please submit a written certification that a diligent search has been completed and all responsive documents have been produced to the Committee on Natural Resources. If you have any questions about this request, please contact the Committee on Natural Resources Oversight and Investigations Subcommittee majority staff at (202) 225-6065 and minority staff at (202) 225-7107.

Sincerely,

  
Raul M. Grijalva  
Chair  
Committee on Natural Resources

  
Rob Bishop  
Ranking Republican  
Committee on Natural Resource

## **Responding to Committee Document Requests**

In responding to document requests from the Committee on Natural Resources, please apply the instructions and definitions set forth below:

### **Instructions**

1. In complying with the request, you should produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Requested records, documents, data, or information should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization, or individual denoted in this request has been, or is currently, known by any other name than that herein denoted, the request should be read also to include them under that alternative identification.
3. The Committee's preference is to receive documents in electronic form (i.e., memory stick or thumb drive) in lieu of paper productions. Documents produced in electronic format should also be organized, identified, and indexed electronically. Consult with the Committee to determine the appropriate format in which to produce the information.
4. Each document produced should be produced in a form that renders the document capable of being copied.
5. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, box, or folder is produced, each CD, hard drive, memory stick, thumb drive, box, or folder should contain an index describing its contents.
6. Documents produced in response to this request should be produced together with copies of file labels, dividers or identifying markers with which they were associated when this request was issued. To the extent that documents were not stored with file labels, dividers, or identifying markers, they should be organized into separate folders by subject matter prior to production.
7. When you produce documents, you should identify the paragraph in the Committee's schedule to which the documents respond.
8. It shall not be a basis for refusal to produce documents that any other person or entity also possesses a non-identical or identical copy of the same documents.
9. If compliance with the request cannot be made in full, compliance should be made to the extent possible and should include an explanation of why full compliance is not possible.

10. In the event that any document or part of a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document or part of a document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
11. If any document responsive to this request was, but no longer is, in your possession, custody, or control, you should identify the document (stating its date, author, subject and recipients) and explain the circumstances by which the document ceased to be in your possession, custody, or control.
12. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you should produce all documents which would be responsive as if the date or other descriptive detail were correct.
13. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.
14. All documents should be Bates-stamped sequentially and produced sequentially.
15. Documents produced to the Committee in response to this request should be delivered to majority staff in Room 1324 of the Longworth House Office Building.

#### Definitions

1. The term "**document**" means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone calls, text messages, MMS or SMS messages, other mobile-to-mobile messages, instant messages or online chat messages, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, voice mails, microfiche, microfilm, videotape,

recordings and motion pictures), and electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, memory sticks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term "**documents in your possession, custody, or control**" means (a) documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, or representatives acting on your behalf; (b) documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and (c) documents that you have placed in the temporary possession, custody, or control of any third party.
3. The term "**communication**" means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face-to-face, in a meeting, by telephone, facsimile, mail, e-mail (desktop or mobile device), text message, MMS or SMS message, other mobile-to-mobile message, instant message or online chat, telexes, releases, personal delivery, or otherwise.
4. The terms "**and**" and "**or**" shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
5. The terms "**person**" or "**persons**" means natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof.
6. The term "**identify**," when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; and (b) the individual's business address and phone number.
7. The terms "**referring or relating**," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any manner whatsoever pertinent to that subject.
8. The term "**employee**" means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, subcontractor, or any other type of service provider.